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September 21, 2022

VIA ECF

Judge Pamela K. Chen
United States District Court for the
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Kurtz v. Kimberly-Clark Corp., et al.*, No. 1:14-cv-01142-PKC-RML;
Honigman v. Kimberly Clark Corp., No. 2:15-cv-02910-PKC-RML
Plaintiffs' Responses to Court's September 7, 2022 Order

Dear Judge Chen:

We write on behalf of plaintiffs Dr. D. Joseph Kurtz and Gladys Honigman ("Plaintiffs") in response to the Court's request that class counsel identify the number of claims submitted to the claims administrator by New York class members. *See* September 7, 2022 Minute Entry.¹ The Claims Administrator, Kroll Settlement Administration LLC ("Kroll"), has advised class counsel that 3,724 claims for 42,386 packages (representing a total value of \$35,097.40) have been made for purchases in New York and 3,375 claims for 33,803 packages (representing a total value of \$25,901.30) have been made by claimants with a New York address. Class counsel infers that there is substantial, but not complete, overlap between these groups of claimants, and the claims remain subject to review and approval by Kroll. Plaintiffs will further contextualize and discuss this information as part of the forthcoming supplemental briefing to be filed by October 10, 2022.

Respectfully submitted,

/s/ Vincent M. Serra

Vincent M. Serra
Counsel for Plaintiffs

cc: All Counsel of Record (via ECF)

¹ The Court's September 9, 2022 Order vacated the September 7, 2022 Order requiring class counsel to produce contemporaneous billing records, but did not vacate the Order with respect to the Court's request for New York-specific claims information. *See* September 9, 2022 Text Order Supplementing 9/7/22 Final-Approval Hearing Orders.